

June 4, 2020

BY ELECTRONIC FILING

Ronald Repasi
Acting Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Corporate Ownership Change for Nominet UK White Space Database Operations*

Dear Mr. Repasi:

Nominet UK and RED Technologies write to inform the Commission of their planned transfer of Nominet's White Space database management and administration operations to RED.

The planned transaction relates to the corporate ownership of the White Space database ("WSDB") operations that Nominet provides today but will not result in interruption to the Nominet WSDB service or material changes to ongoing database operations. RED commits to fulfilling all of the representations made by Nominet in its application to serve as a WSDB administrator and to the responsibilities of a WSDB administrator.¹


Like Nominet, RED Technologies is a highly experienced operator of spectrum access systems. RED is currently represented on the Board of Directors of Winn Forum and has applications pending before the FCC to serve as both a CBRS SAS administrator² and ESC provider.³ In Europe, RED is a premier enabler of Licensed Shared Access ("LSA") and has already begun piloting its cloud-based LSA solution in major European markets. RED Technologies has also been deeply involved in the development of LSA regulations in Europe and has led LSA standardization activities at ETSI and 3GPP.

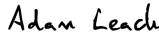
RED looks forward to working with the Commission to support expanded broadband connectivity and innovative new uses of spectrum through TV White Spaces technology.

¹ See Letter from Adam Leach, Director of Research and Development, Nominet UK, to Marlene H. Dortch, Secretary, FCC, ET Docket No. 04-186 (filed Nov. 16, 2017) (proposal to serve as TVWS database administrator).

² See Proposal by RED Technologies for Environmental Sensing Capability (ESC), GN Docket No. 15-319 (filed Sept. 5, 2019).

³ See Proposal by RED Technologies for Spectrum Access System Administrator, GN Docket No. 15-319 (filed May 5, 2017).

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Pierre-Jean Muller
CEO, RED Technologies

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Adam Leach
CIO, Nominet UK